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| **MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  **Program Quality Assurance Services** |

##### COORDINATED PROGRAM REVIEW

## CORRECTIVE ACTION PLAN

Charter School or District: Erving

CPR Onsite Year: 2014-2015

Program Area: Special Education

All corrective action must be fully implemented and all noncompliance corrected as soon as possible and no later than one year from the issuance of the Coordinated Program Review Final Report dated 03/10/2015.

**Mandatory One-Year Compliance Date:** **03/10/2016**

**Summary of Required Corrective Action Plans in this Report**

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 20 | Least restrictive program selected | Partially Implemented |
| SE 32 | Parent advisory council for special education | Partially Implemented |
| SE 55 | Special education facilities and classrooms | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 12A | Annual and continuous notification concerning nondiscrimination and coordinators | Partially Implemented |
| CR 21 | Staff training regarding civil rights responsibilities | Partially Implemented |
| CR 24 | Curriculum review | Partially Implemented |
| CR 25 | Institutional self-evaluation | Partially Implemented |

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| **Criterion & Topic:**  SE 20 Least restrictive program selected | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Record review and interviews indicate that the district does not, in all cases, provide a non-participation statement in the IEP that is specific to the student, stating why the removal from the general education classroom is considered critical to the student's program, and providing the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily. | | |
| **Description of Corrective Action:**  In recent years, it has become the practice among some teachers who provide services to students who qualify for special education support services, to write non-participation statements that are generic in nature, rather than sufficiently specific to the needs of individual student and his/her program. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  09/01/2015 |
| **Evidence of Completion of the Corrective Action:**  The Director of Student Support Services meets monthly with the special education staff. The Director has explained and discussed this compliance finding. The staff has brought forward examples of quality non-participation statements that are specific to the student and the student's programming needs.  Examples of recent statements:  "Due to challenges connected to his disability STUDENT requires specially designed instruction in a quiet, non-distracting environment, outside of the general education classroom to work toward his expressive language goal and benchmarks. STUDENT will receive services outside of the general education classroom for...(service delivery content and times follow).  "STUDENT'S learning needs connected to his disability require that specific services are provided outside of the general education classroom. STUDENT has a diagnosis of Velo-cardio-facial syndrome that impacts his ability to communicate effectively so that he can be understood by other people, and also hinders his progress in the academic curriculum as delivered in the general education setting. STUDENT needs multi-sensory drill and repetition to learn and retrieve new skills and vocabulary. STUDENT'S learning needs require him to receive services in a quiet 1:1 setting away from the general education classroom. (List of service delivery content and times follow)." | | |
| **Description of Internal Monitoring Procedures:**  Every Individualized Education Program (IEP) that is written for a student is brought through a strict editing process at the Student Support Services office. As Director, I will continue to monitor every component of the IEP to ensure continued compliance and high quality documents. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 20 Least restrictive program selected | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Provide evidence of discussion and training conducted with key staff, including signed attendance logs and any materials used by September 21, 2015.  Provide a detailed description of the newly developed monitoring system including roles of any responsible staff involved in the editing and monitoring process, in addition to the director, by September 21, 2015.  Submit the results of a review of student records for Team meetings held after corrective actions were implemented for evidence of complete nonjustification participation statements. Report the number of records reviewed, and the number found to be in compliance. For any non-compliance found, provide the results of a root cause analysis of the non-compliance along with a detailed description of the district's plan to remedy the remaining non-compliance by January 8, 2016.  \*Please note when conducting internal monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). | | |
| **Progress Report Due Date(s):**  09/21/2015  01/08/2016 | | |

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| **Criterion & Topic:**  SE 32 Parent advisory council for special education | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Documents and interviews indicate that Erving Public Schools has not established its own Parent Advisory Council (PAC), but participates as a member of the larger Erving School Union 28 PAC. The district has not applied to the Department for a waiver to implement their PAC in this manner. | | |
| **Description of Corrective Action:**  Historically, the Director maintained consistent effort to establish PACs at each district Elementary school. meetings were posted in the school newsletter, and efforts through person-to-person contact were made. Despite these efforts. parent attendance was very poor. Often one parent, and more often, no parents attended the meetings. The collaboration of a small, though active and committed group of parents from the four Union districts has been, and is anticipated to remain beneficial to the students due to the shared vision of this PAC. Erving Public Schools proposes to continue to implement the PAC according to current practice: As a community within the Erving School Union #28, including the four Union districts, Erving parents of students with disabilities who are eligible for special education services are welcome and encouraged to participate in the Erving School Union #28 PAC. The members of the Erving School Union PAC collaborate toward common goals: parent education, parent and student support, and community networking and outreach. All efforts are focused on the educational and social well-being of students with disabilities. The Director of Student Support Services attends all meetings, conducts training and shares information, and has formed a relationship with each family. For our Union, this collaborative format has strengthened our purpose and parent participation. As agreed upon by the PAC, meetings are held in a rotation between the Erving Elementary School and the Leverett Elementary School, as these schools are most centrally located. In addition, the PAC has a relationship with the Community Network for Children (CNC), and PAC members also attend eight evening parent support group meetings a year in collaboration with CNC. This relationship has provided a safe forum for parents to share concerns and to provide up port to one another, and to access the Director of Student Support Services and the CNC Director who facilitates these meetings. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  04/03/2015 |
| **Evidence of Completion of the Corrective Action:**  A Request For Alternative Compliance Waiver form to implement the PAC in the above described manner was submitted on 2/4/2015 via US mail to Darlene Lynch, Director, Program Quality Assurance. This request was approved via a letter from Darlene Lynch dated February 20, 2015. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Student Support Services serves as facilitator of the PAC, and monitors the process to ensure that all Massachusetts requirements and regulations for PACs are implemented, including: offering membership to all parents of students found eligible for special education services in each district; conducting at least one training annually on the rights of students and their parents and guardians; and meeting at regular intervals. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 32 Parent advisory council for special education | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Provide a copy of the Department's letter of approval of the Alternate Compliance Waiver Form dated February 20, 2015 by September 9, 2015. | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |

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| **Criterion & Topic:**  SE 55 Special education facilities and classrooms | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Observation and interviews indicate that Room 110 at Erving Elementary School, a space for providing pull-out special education services for 3rd-5th grade students, is placed in a wing that houses pre-school, kindergarten, and related services instructional spaces that is removed from the students' grade level peers and does not maximize the inclusion of such students into the life of the school. | | |
| **Description of Corrective Action:**  Observation and interviews indicate that Room 110 at Erving Elementary School, a space for providing pull-out special education services for 3rd-5th grade students, is placed in a wing that houses pre-school, kindergarten, and related services instructional spaces that is removed from the students' grade level peers and does not maximize the inclusion of such students into the life of the school. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  09/01/2015 |
| **Evidence of Completion of the Corrective Action:**  The principal of the Erving Elementary School, Jim Trill, has discussed with the Superintendent, Robert Mahler, and the Director of Student Support Services, Prudence Marsh, the plant move, by September 1, 2015, the above described space where special education services are provided to 3rd-5th grade students who require support services in a separate setting. These services will be provided in room 105, a classroom located between room 106, a 3rd grade classroom, and room 104, a 4th grade classroom. These classrooms are all located in the center of the school, with entries off of the school library and the school "Hub". This plan will maximize the inclusion of such students into the life of the school. | | |
| **Description of Internal Monitoring Procedures:**  The Erving Elementary School Principal will observe and monitor the effectiveness on student learning and well-being due to the change in location of this support service space. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 55 Special education facilities and classrooms | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Schedule a date with the Department for an on-site visit prior to September 21, 2015, to verify the changes for the pull-out services for 3rd to 5th grade students | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |

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| **Criterion & Topic:**  CR 10A Student handbooks and codes of conduct | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document reviews and interviews indicate that the nondiscrimination policy in the student handbook does not include the protected category of gender identity. | | |
| **Description of Corrective Action:**  The Erving District/Elementary School updated policies and staffing changes that were entered into the 2014-2015 school handbook. However, it was brought to our attention during the CPR in October 2014, that the handbook did "not contain the required protected category of gender identity." | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  09/01/2015 |
| **Evidence of Completion of the Corrective Action:**  Robert Mahler, Superintendent of the Erving School Union #28, is working with the Erving school committee to update policies. This spring, between April and June 2015, the required protected category of gender identity will be added to the existing Shutesbury School District Policy Prohibiting Discrimination and Harassment. | | |
| **Description of Internal Monitoring Procedures:**  To ensure that all information is correct and current, all content and policies that comprise the Erving Elementary School handbook are reviewed each year. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Provide a copy of the updated Erving Elementary School Handbook containing the nondiscrimination policy that includes the required protected category of gender identity along with a description of how it was distributed to staff and parents by September 21, 2015. | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |

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| **Criterion & Topic:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review and interviews confirm that the district's notification concerning nondiscrimination does not include the protected category of gender identity. | | |
| **Description of Corrective Action:**  The Erving School District/Elementary School has an updated (Feb/2015) letterhead/clause that now includes the protected category of gender identity. This letterhead and clause is on all correspondence/written material that is sent to families and the community on behalf of the school. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  04/03/2015 |
| **Evidence of Completion of the Corrective Action:**  The clause at the bottom of the Erving Elementary School letterhead now states: "The Erving School District assures that all programs, activities, and employment opportunities are offered without regard to race, color, national origin, gender, gender identity, disability, economic status, homelessness, religion, or sexual orientation." | | |
| **Description of Internal Monitoring Procedures:**  To ensure that all content used to publicize the school district remains correct and current, all content and policies are reviewed and updated each year. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit a sample copy of the newly updated Erving Elementary School letterhead along with a list of recent uses and distributions by September 21, 2015. | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |

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| **Criterion & Topic:**  CR 21 Staff training regarding civil rights responsibilities | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review and interviews indicate that the district's training materials regarding civil rights responsibilities does not include the protected category of gender identity. | | |
| **Description of Corrective Action:**  Each year, in September, the Director of Student Support Services has presented an in-service training to all school personnel regarding civil rights responsibilities, including the prevention of discrimination and harassment based on race, color, gender, religion, national origin, sexual orientation, age, and homelessness. This training has not previously included the protected category of gender identity. Based on the Erving Coordinated Program Review, the Erving School Union #28 Superintendent, the Director of Student Support Services, and the Erving Elementary School Principal, are now aware of the requirement to include the protected category of gender identity in the civil rights in-service training regarding prevention of discrimination and harassment. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  09/30/2015 |
| **Evidence of Completion of the Corrective Action:**  In September, 2015, the Director of Student Support Services will present an in-service training to all school personnel regarding civil rights responsibilities, including the prevention of discrimination and harassment based on race, color, gender, gender identity, religion, national origin, sexual orientation, age, and homelessness. During the September, 2015 training, critical focus will be placed on issues of gender identity as these pertain to the prevention of discrimination and harassment in our schools. All staff will be given documentation regarding the law "An Act Relative to Gender Identity" that went into effect on July, 1, 2012, including the accompanying DESE guidance document, clarifying how the law and its accompanying regulations apply to school districts, and the actions we can take to ensure the well-being of all our students, staff, and families. | | |
| **Description of Internal Monitoring Procedures:**  The annual Civil Rights training will maintain current and consistent information regarding school district civil rights responsibilities, ensuring that all staff are informed with the most recent information and guidance from DESE. If and when there are questions and/or concerns regarding discrimination or harassment, the Superintendent, the Director of Student Support Services, the Erving Elementary School Principal, and involved staff members will discuss necessary issues, and take the appropriate actions to ensure the continued well-being of all students, staff, and families. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 21 Staff training regarding civil rights responsibilities | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit evidence of training on civil rights responsibilities to staff that includes the protected category gender identity, to include the agenda, signed attendance log, and any materials used by September 21, 2105. | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |

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| COORDINATED PROGRAM REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  CR 24 Curriculum review | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review and interviews indicate that the district's curriculum review checklist does not include the protected category of gender identity. | | |
| **Description of Corrective Action:**  Historically, consistent with the Massachusetts regulation 603 CMR 26.00, the Erving School Committee passed a policy titled "Access to Equal Educational Opportunity in the Basic Instructional Program" that was last updated in 2007. The policy states: (1) The District shall, "through its curricula, encourage respect for the human and civil rights of all individuals regardless of color, sex. religion, national origin or sexual orientation." (2) The teachers in the District "shall review all instructional and educational materials for simplistic and demeaning generalizations, lacking educational merit, on the basis of race, color, sex, religion, national origin, or sexual orientation. Appropriate activities, discussions and or supplementary materials shall be used to provide balance and context for any such stereotypes depicted in such materials", that have been chosen for other valid educational purposes. Whenever possible, the District will remove any discriminatory materials when instructionally, logistically, and financially possible, to be replaced by materials that depict a broad variety of positive roles consistent with the intent of 603 CMR 26.00. Historically, to ensure that all teachers are aware of this District policy, and to secure documentation that each teacher has reviewed all instructional and educational materials for simplistic and demeaning generalizations, teachers are required to complete a document "Annual Examination of Educational Materials for Simplistic and Demeaning Generalizations". Corrective Action Plan: (1) In the spring of 2015, the Erving School Committee will update the "Access to Equal Educational Opportunity in the Basic Instructional Program" policy to include the protected category of gender identity. (2) By June 1, 2015, the Erving School Principal and the Director of Student Support Services, will hold a staff meeting where staff will be informed about the requirement regarding the District's policy and administrative procedures to ensure that teachers annually review all educational materials for simplistic and demeaning generalizations lacking educational merit on the basis of race, color, gender, gender identity, religion, national origin, and sexual orientation. (3) By June 15, 2015, all teachers will complete an updated revision of the "Annual Examination of Educational Materials for Simplistic and Demeaning Generalizations" document that includes teacher responses to the following: -examination of curriculum and instructional materials that the teacher uses to ensure that these do not contain simplistic or demeaning generalizations, lacking educational merit, on the basis of race, color, gender, gender identity, religion, national origin, and sexual orientation. -steps to eliminate any simplistic and demeaning generalizations in curriculum, materials and/or instruction -lists of materials needed. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  06/15/2015 |
| **Evidence of Completion of the Corrective Action:**  Updated policy as described above, and Annual Examination of Educational Materials for Simplistic and Demeaning Generalizations completed by all teachers by June 15, 2015, and collected by the Director of Student Support Services. | | |
| **Description of Internal Monitoring Procedures:**  The Erving District/Elementary School will maintain updated policies, review procedures annually, and require all teachers to complete Annual Examination of Educational Materials documentation annually. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 24 Curriculum review | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Provide a copy of the newly updated "Access to Equal Educational Opportunity in the Basic Instructional Program" policy that includes the protected category of gender identity, along with evidence of discussion and training for staff regarding the new policy including agenda and signed attendance sheet by September 21, 2015. | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |

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| **Criterion & Topic:**  CR 25 Institutional self-evaluation | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review and interviews indicate that while the district evaluates most aspects of its Pre-K to 6th grade program annually, the district's evaluation does not include the protected category of gender identity. | | |
| **Description of Corrective Action:**  Historically, the Erving Elementary School District has requested that teachers complete an "Annual Institutional Self-Evaluation of Educational Programs" form, and that staff directing extracurricular activities complete an "Annual Institutional Self-Evaluation of Extracurricular Programs" form. The form requested of teachers regarding educational programs includes a statement: "To the best of your knowledge, do you have any students in your classroom who have been denied access to any of these educational activities due to race, color, sex, religion, national origin, limited English proficiency, sexual orientation, disability or housing status. Listed activities: Language Arts, Math, Science, Social Studies, recess, lunch, bus transportation, Music, Art, Physical Education, library, technology, field trips, any other school activity. The form requested of directors of extracurricular activities requests descriptions of the program, the application process, and criteria for entry, and who is responsible for determining admittance to the program. Also requested is a list of any students who applied to the program but were not admitted, with an explanation of why the student was not admitted. | | |
| **Title/Role(s) of Responsible Persons:**  Prudence Marsh, Ed.D., Director of Student Support Services | | **Expected Date of Completion:**  06/30/2015 |
| **Evidence of Completion of the Corrective Action:**  The Erving Elementary School principal, and the Director of Special Education and Student Support Services will provide a thorough explanation of the requirement that all students have access to all programs, including athletics and extracurricular activities. Updated forms that include the category of GENDER IDENTITY will be reviewed and distributed to staff who will be required to complete these forms at the meeting. A sign-in sheet will document staff participation. | | |
| **Description of Internal Monitoring Procedures:**  It is expected that the "Annual Evaluation of Educational Programs" for student access will be completed as this procedure will be REQUIRED rather than requested. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Approved  **Status Date:** 05/13/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Provide copies of the "Annual Institutional Self-Evaluation of Educational Programs" and the "Annual Institutional Self-Evaluation of Extracurricular Programs" forms, that include the required protected category gender identity, along with any conclusions reached in the analysis of the information collected, and a description of any changes the district plans to make based on that analysis by September 21, 2015. | | |
| **Progress Report Due Date(s):**  09/21/2015 | | |